

1 KATHERINE M. FORSTER (State Bar No. 217609)
Katherine.Forster@mto.com
2 CRAIG JENNINGS LAVOIE (State Bar No. 293079)
Craig.Lavoie@mto.com
3 LAUREN N. BECK (State Bar No. 343375)
Lauren.Beck@mto.com
4 KYRA E. SCHOONOVER (State Bar No. 343166)
Kyra.Schoonover@mto.com
5 MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
6 Los Angeles, California 90071-3426
Telephone: (213) 683-9100
7 Facsimile: (213) 687-3702

8 Attorneys for Defendant BLACKBERRY
CORPORATION
9

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12 NEELAM SANDHU, an individual,

13 Plaintiff,

14 vs.

15 BLACKBERRY CORPORATION, a
Delaware Corporation,

16 Defendant.

Case No. 3:24-cv-02002-SK

**DECLARATION OF LAUREN N. BECK
REGARDING EXHIBITS TO DKT. NO.
111**

Judge: Hon. Sallie Kim

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5
6
7
8

9
10
11
12

13
14
15
16

17
18
19
20
21
22
23

24
25
26
27
28

6. On December 12, counsel for Plaintiff informed me that **Exhibit 3** (filed at Dkt. 111-7), which contains excerpts of the transcript of the August 22, 2025 deposition of Neelam Sandhu, omitted the court reporter's certification page. The corrected Exhibit 3 therefore adds the inadvertently omitted reporter certification page. No further changes have been made to the content of Exhibit 3.

7. Except for the changes described above, no changes have been made to the content of any of the exhibits attached to this declaration.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 12th day of December, 2025, at Los Angeles, California.

DATED: December 12, 2025

By: */s/ Lauren N. Beck*

Lauren N. Beck